

DOC NO
REC'D/FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

2013 AUG - 7 AM 11:51

UNITED STATES OF AMERICA

v.

CHESTER D. HOWARD
a/k/a C. DANIEL HOWARD,

Case No.

13 CR 98
INDICTMENT WD OF WI

18 U.S.C. § 152(3)
18 U.S.C. § 1014

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

On or about October 16, 2007, in the Western District of Wisconsin, the defendant,

CHESTER D. HOWARD
a/k/a
C. DANIEL HOWARD,

knowingly made a false statement for the purposes of influencing the action of State Bank of Cross Plains, Cross Plains, Wisconsin, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in connection with a loan, in that, in a document entitled "Consumer Security Agreement," dated October 16, 2007, the defendant falsely stated that he was the owner of property he was providing to the bank as collateral for a loan, when in fact as he well knew he was not the owner of the property, specifically a 2006 Campagna T-Rex motorcycle, bearing identification No. 2C9TAK16561145311.

(All in violation of Title 18, United States Code, Section 1014).

COUNT 2

On or about November 16, 2007, in the Western District of Wisconsin, the defendant,

CHESTER D. HOWARD
a/k/a
C. DANIEL HOWARD,

knowingly made a false statement for the purposes of influencing the action of the Park Bank, Madison, Wisconsin, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in connection with a loan, in that, in a document entitled "Chattel Security Agreement," dated November 16, 2007, the defendant falsely stated that he was the owner of property he was providing to the bank as collateral for a loan, when in fact as he well knew he was not the owner of the property, specifically a 2006 Campagna T-Rex motorcycle, bearing identification No. 2C9TAK16561145311.

(All in violation of Title 18, United States Code, Section 1014).

COUNT 3

On or about January 4, 2008, in the Western District of Wisconsin, the defendant,

CHESTER D. HOWARD
a/k/a
C. DANIEL HOWARD,

knowingly made a false statement for the purposes of influencing the action of the Park Bank, Madison, Wisconsin, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in connection with a loan, in that, in a document entitled "Chattel Security Agreement," dated January 4, 2008, the defendant falsely stated that he was the owner of property he was providing to the bank as collateral for a

loan, when in fact as he well knew he was not the owner of the property, specifically a 2006 Campagna T-Rex motorcycle, bearing identification No. 2C9TAK16561145311.

(All in violation of Title 18, United States Code, Section 1014).

COUNT 4

On or about November 21, 2008, in the Western District of Wisconsin, the defendant,

CHESTER D. HOWARD
a/k/a
C. DANIEL HOWARD,

knowingly made a false statement for the purposes of influencing the action of the Park Bank, Madison, Wisconsin, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in connection with a loan, in that, in a document entitled "Chattel Security Agreement," dated November 21, 2008, the defendant falsely stated that he was the owner of property he was providing to the bank as collateral for a loan, when in fact as he well knew he was not the owner of the property, specifically a 2006 Campagna T-Rex motorcycle, bearing identification No. 2C9TAK16561145311, a 2007 Polaris snowmobile bearing identification No. SN1WB1AS37C711871, a 2007 Articat snowmobile bearing identification No. 4UF07SNW37T101832, and a 2007 Ski Doo Mach ZX snowmobile bearing identification No. 2BPSAA7BX7V000243.

(All in violation of Title 18, United States Code, Section 1014).

COUNT 5

On or about December 11, 2009, in the Western District of Wisconsin, the defendant,

CHESTER D. HOWARD
a/k/a
C. DANIEL HOWARD,

knowingly made a false statement for the purposes of influencing the action of the Park Bank, Madison, Wisconsin, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in connection with a loan, in that, in a document entitled "Personal Financial Statement," dated December 11, 2009, the defendant falsely stated that he had a vested interest in a company (Dairyland) with a value of \$350,000, when in fact, as he well knew, did not have a vested interest in the company.

(All in violation of Title 18, United States Code, Section 1014).

COUNT 6

On or about December 3, 2010, in the Western District of Wisconsin, the defendant,

CHESTER D. HOWARD
a/k/a
C. DANIEL HOWARD,

knowingly and fraudulently made a material false declaration, under the penalty of perjury, as permitted under Section 1746 of Title 28, in and in relation to a case under Title 11, In RE: Howard Chester Daniel and Howard, Jill Christine, Case No. 3-10-18102-rdm, by submitting Schedules of Assets and Liabilities and a Statement of Financial Affairs, in which the defendant fraudulently omitted to disclose material

information, specifically the defendant failed to provide information on "Schedule A - Real Property" relating to the fact that he was the one-third owner of real property located in Rusk County, Wisconsin.

(All in violation of Title 18, United States Code, Section 152(3)).

COUNT 7

On or about August 31, 2011, in the Western District of Wisconsin, the defendant,

CHESTER D. HOWARD
a/k/a
C. DANIEL HOWARD,

knowingly and fraudulently made a material false declaration, under the penalty of perjury, as permitted under Section 1746 of Title 28, in and in relation to a case under Title 11, In RE: Howard Chester Daniel and Howard, Jill Christine, Case No. 3-11-15475-rdm, by submitting Schedules of Assets and Liabilities and a Statement of Financial Affairs, in which the defendant fraudulently omitted to disclose material information, specifically the defendant failed to provide information on "Schedule A - Real Property" relating to the fact that he was the one-third owner of real property located in Rusk County, Wisconsin.

(All in violation of Title 18, United States Code, Section 152(3)).

A TRUE BILL



PRESIDING JUROR



JOHN W. VAUDREUIL
United States Attorney

Indictment returned: 8/7/2013